



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 27, 2023

**BY ECF**

The Honorable P. Kevin Castel  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Raul Silva*, 20 Cr. 120 (PKC)**

Dear Judge Castel:

The Government respectfully requests to file a brief reply to the defendant's responses to the Government's motions *in limine*. (ECF No. 95.) During the conference on December 6, 2022, the Court set the following schedule for the parties' motions *in limine*:

- The Government's motions were due February 17, 2023<sup>1</sup>;
- The defendant's responses to the Government's motions, and any affirmative defense motions, were due March 14, 2023; and
- The Government's responses are due March 28, 2023.

The Government's understanding is that under the Court's schedule, the Government is permitted by March 28, 2023, to respond the defendant's affirmative motions *in limine*, but not to reply to the defendant's responses to the Government's motions *in limine*. Certain portions of the defendant's responses to the Government's motions, however, misunderstood and/or mischaracterized the record and/or the scope of those motions. As a result, the Government respectfully requests permission, in connection with its forthcoming submission, to briefly reply to the defendant's responses to two of the Government's motions *in limine*—namely, the motions to introduce (i) certain of the defendant's prior convictions and (ii) certain co-conspirator statements—to clarify the record and the scope of the Government's original motions.

*Application  
GRANTED  
JSD  
3-28-23*

<sup>1</sup> This deadline was subsequently adjourned to February 24, 2023.

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Respectfully submitted,

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cc: Eric R. Breslin, Esq.